

July 11, 2023

Client-Matter: 57969-065

BY ECF

Hon. Sanket J. Bulsara, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Beeks v. Community Counseling and Mediation, et al.*
Case No. 22-cv-02843-SJB

Dear Judge Bulsara:

We represent defendants Community Counseling & Mediation and Emory X. Brooks (“Defendants”) in the above-referenced action. In accordance with the Order entered June 29, 2023, I submit this letter on behalf of Defendants and plaintiff Shameka T. Beeks (“Plaintiff”) to provide: (i) the parties’ joint schedule for the completion of discovery; (ii) a proposed summary judgment briefing schedule; and (iii) the parties’ position on the filing of a Second Amended Complaint. Plaintiff’s counsel has reviewed and approved this joint submission.

The parties respectfully request that the Court “So Order” the following:

Schedule for Completion of Discovery

The deadline to complete all discovery to be extended, *nunc pro tunc*, from Friday, June 30, 2023, to **Friday, September 29, 2023**;

Parties’ counsel shall meet and confer on **Monday, August 7, 2023 at 11:00 a.m.** to address any remaining written discovery issues;

Resumed deposition of defendant Emory Brooks to be completed by **Thursday, August 31, 2023**. The parties have agreed that the resumed deposition of Mr. Brooks shall be limited to 3.5 hours;

Deposition of non-party Salina Mullins to be completed by **Thursday, August 31, 2023**.

Hon. Sanket J. Bulsara, U.S.M.J.
July 11, 2023
Page 2

Proposed Summary Judgment Briefing Schedule

The parties have met and conferred and propose, subject to Court approval, the following summary judgment briefing schedule which reflects a slight enlargement of the time-frames set forth in Local Civil Rule 6.1(a):

- (1) Notice of Motion and supporting papers to be filed by **Wednesday, October 18, 2023;**
- (2) Opposition papers to be filed by **Wednesday, November 8, 2023;**
- (3) Reply to be filed by **Wednesday, November 15, 2023;**
- (4) Motion shall be returnable **Tuesday, November 21, 2023.**

Position on Second Amended Complaint

Plaintiff has decided not to further amend her complaint. The operative pleading remains the amended complaint filed August 8, 2022 (ECF No. 14).

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

s/ *Kenneth D. Friedman*

By: Kenneth D. Friedman

CC: All Counsel of Record (by ECF)